

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC.;
ANYTHING GOES LLC d/b/a MAIL
BOXES ETC., and JCK INDUSTRIES,
INC., on behalf of themselves and all others
similarly situated,

Case No.: 08-CV-00042 (JG) (VVP)

Plaintiffs,

vs.

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., et al.,

Defendants.

**PLAINTIFFS' MOTION TO
PRELIMINARILY APPROVE SETTLEMENT WITH
DEFENDANTS KUEHNE + NAGEL INTERNATIONAL AG
AND KUEHNE + NAGEL, INC. AND CONDITIONALLY
CERTIFY SETTLEMENT CLASS**

Plaintiffs hereby move this Court for entry of an order preliminarily approving the settlement reached with Defendants Kuehne + Nagel International AG and Kuehne + Nagel, Inc. and certifying a settlement class. In support of this motion, the Plaintiffs submit their Memorandum In Support Of Motion To Preliminarily Approve Settlement With Defendants Kuehne + Nagel International AG and Kuehne + Nagel, Inc. And Conditionally Certify Settlement Class, together with the Declaration of Christopher Lovell in support of same, with attached exhibit.

Dated: September 17, 2012

Respectfully submitted,

s/ Christopher Lovell

Christopher Lovell
Benjamin M. Jaccarino
LOVELL STEWART HALEBIAN
JACOBSON LLP
61 Broadway, Suite 501
New York, NY 10006
Telephone: (212) 608-1900
Facsimile: (212) 719-4775
Email: clovell@lshllp.com
bjaccarino@lshllp.com

W. Joseph Bruckner
Heidi M. Silton
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
Email: wjbruckner@locklaw.com
hsilton@locklaw.com

Daniel E. Gustafson
Daniel C. Hedlund
Michelle J. Looby
Joshua J. Rissman
GUSTAFSON GLUEK PLLC
650 Northstar East
608 Second Avenue South
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
Email: dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
jrissman@gustafsongluek.com

Steven N. Williams
Imtiaz A. Siddiqui
COTCHETT, PITRE & MCCARTHY, LLP
1 Liberty Plaza, 23rd Floor
New York, NY 10006
Telephone: (212) 682-3198
Facsimile: (646) 219-6678
Email: isiddiqui@cpmlegal.com